



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

OCT 15 2014

City of New Haven
Attn: William Clark, Esq.
BOE Chief Operating Officer
54 Meadow Street
New Haven, Connecticut 06519

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
Bowen Field Complex
175 Crescent Street / New Haven, Connecticut

Dear Mr. Clark:

The U.S. Environmental Protection Agency ("EPA") is in receipt of the City of New Haven ("the City") Notification¹ for approval of a plan to clean up and dispose of PCB-contaminated materials on its property known as the Bowen Field Complex and located at 175 Crescent Street ("the Site") in New Haven, Connecticut. Specifically, the Site contains PCBs in caulk, paint, concrete, soils, and other materials at levels that exceed the allowable PCB levels under the federal PCB regulations at 40 CFR § 761.20(a), § 761.61(a) and § 761.62.

Certain structures on the Site will be demolished/renovated as part of a planned upgrade project. The City is proposing to remove PCBs with greater than (">") 1 part per million ("ppm") to achieve an unrestricted use cleanup in accordance with 40 CFR § 761.61(a). A summary of the proposed waste removal and disposal is shown in Appendix A.

The City has determined that certain products (e.g., interior caulk, roofing materials) which have a PCB concentration at less than ("<") 50 parts per million ("ppm"), meet the criteria for an *Excluded PCB Product* under § 761.3. Under the PCB regulations, *Excluded PCB Products* are unregulated for cleanup and disposal. Accordingly, the City will be managing these < 50 ppm PCB products in accordance with the Connecticut Department of Energy and Environmental Protection ("CTDEEP") requirements.

¹ Information was submitted by Eagle Environmental on behalf of the City of New Haven to support a PCB cleanup and disposal approach for *PCB remediation waste* under 40 CFR §§ 761.61(a) and (c) and disposal of *PCB bulk product waste* under 40 CFR § 761.62. Information was submitted dated January 9, 2014 (Self-Implementing PCB Cleanup and Disposal Plan (SIP)); May 2, 2014 (Response to EPA comments dated March 26, 2014); May 2, 2014 (SIP, revised); July 16, 2014 (Revised Sampling Plan Bleacher Area); September 17, 2014 (Response to EPA June 12, 2014 comments and SIP revised); October 6, 2014 (email Diagram S0-1); October 7, 2014 (email clarification on bleacher classification and disposal); and October 9, 2014 (email Revised Table IV and sink hole sampling information). These submittals will be referred to as the "Notification".

With the exception of the characterization sampling frequency for disposal, the City's plan meets the notification requirements at 40 CFR § 761.61(a)(3). Given the nature of the waste, the characterization sampling results, and the proposed removal and disposal plan, EPA has determined that the data will be adequate for disposal of the PCB-contaminated wastes. EPA finds that the use of the alternative sampling results will not pose an unreasonable risk of injury to health or the environment. EPA applies this reasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c) and with Section 6(e) of TSCA, 15 USC § 2605(e).

The City may proceed with its PCB cleanup and disposal plan in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; its Notification; and this Approval, subject to the conditions of Attachment 1. Please be aware that this Approval does not address cleanup of contaminated sediments that may be identified within Beaver Pond (see Attachment 1, Condition 1).

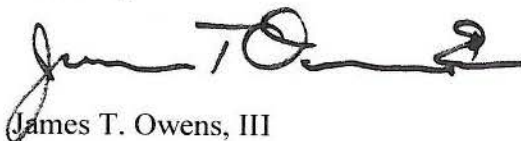
Questions and submittals required under this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527 / Facsimile: (617) 918-0527

The Approval does not release the City from any applicable requirements of federal, state or local law, including the requirements related to cleanup and disposal of PCBs or other contaminants under the CTDEEP regulations.

Please note that among other requirements that may be necessary to complete this project, EPA will not consider this project complete until it has received documentation, as outlined in Attachment 1, evidencing completion of the work. Please be aware that upon EPA receipt and review of required submittals, EPA may request any additional information necessary to establish that the work has been fully completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



James T. Owens, III
Director, Office of Site Remediation & Restoration

Attachment 1: Cleanup and Disposal Approval Conditions
Appendix A: Summary Table Site Characterization and Waste Disposal
Appendix B: Verification Samples Table

cc: J. Terrill, Eagle Environmental
G. Trombly, CTDEEP
File

ATTACHMENT 1

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification². This Approval does not address cleanup of sediments within Beaver Pond.
 - a. In the event that the City of New Haven (“the City”) identifies other PCB-contaminated wastes subject to cleanup and disposal under the PCB regulations, the City will be required to notify EPA and clean up the PCB-contaminated wastes in accordance with 40 CFR Part 761.
 - b. The City may submit a separate plan to address the PCB contamination or may modify the Notification to incorporate cleanup of the PCBs under this Approval in accordance with Condition 18.
2. The City shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The City shall comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the City shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.

² Information was submitted by Eagle Environmental on behalf of the City of New Haven to support a PCB cleanup and disposal approach for *PCB remediation waste* under 40 CFR §§ 761.61(a) and (c) and disposal of *PCB bulk product waste* under 40 CFR § 761.62. Information was submitted dated January 9, 2014 (Self-Implementing PCB Cleanup and Disposal Plan (SIP)); May 2, 2014 (Response to EPA comments dated March 26, 2014); May 2, 2014 (SIP, revised); July 16, 2014 (Revised Sampling Plan Bleacher Area); September 17, 2014 (Response to EPA June 12, 2014 comments and SIP revised); October 6, 2014 (email Diagram S0-1); October 7, 2014 (email clarification on bleacher classification and disposal); and October 9, 2014 (email Revised Table IV and sink hole sampling information). These submittals will be referred to as the “Notification”.

6. The City is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the City has or receives information indicating that the City or any other person has failed, or may have failed, to comply with any provision of this Approval, it shall report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the City are authorized to conduct the activities set forth in the Notification. The City is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the City from compliance with any applicable requirements of federal, state or local law; or 3) release the City from liability for, or otherwise resolve, any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in 40 CFR § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from the City of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The City shall submit the following information for EPA review and/or approval:
 - a. a certification signed by its selected contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. a contractor work plan, prepared and submitted by the selected contractor(s), detailing the means and methods that will be employed for removal of PCB-contaminated materials and for air monitoring during cleanup, removal, and handling of PCB-containing materials. This work plan should also include information on waste storage, handling, and disposal for each waste stream type and for equipment decontamination; and,
 - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical methods and quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

12. To the maximum extent practical, engineering controls such as dust suppression, shall be utilized during structure demolition and PCB waste removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
13. PCB-contaminated materials with greater than (" $>$ ") 1 part per million (" ppm ") located at the Site shall be removed and disposed of as indicated in the Notification and summarized in Appendix A.
14. Before and during excavation of the storm water drainage system, the City shall inspect to determine if a potential release may have occurred to the soils surrounding the drainage system. If a visual observation (i.e., broken pipe, discolored soil) is observed, the City shall contact EPA for a determination on sampling requirements, if any.
15. Verification sampling shall be conducted as indicated in the Notification and summarized in Appendix B to confirm that the less than or equal to (" \leq ") 1 ppm PCB cleanup standard has been met.
 - a. *Bulk PCB remediation waste* (e.g., soil) verification samples shall be collected on a bulk basis (i.e., mg/Kg) and reported on a dry-weight basis. Samples shall be collected from both excavation bottoms and sidewalls.
 - b. Verification sampling for *porous surfaces* (e.g., asphalt and concrete) shall be performed on a bulk basis (i.e., mg/Kg) and reported on a dry weight analysis. Verification sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches.
 - c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

16. All PCB waste (regardless of concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner prescribed in 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5) or § 761.62, unless otherwise specified below:
 - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under 40 CFR § 761.60.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

17. The City shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the City to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
18. Any modification(s) to the plan, specifications, or information submitted by the City and contained in the Notification, must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
19. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
20. Any misrepresentation or omission of any material fact in the Notification or in any future records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
21. This Approval for these activities may be revoked, modified or otherwise altered if:
(1) EPA finds a violation of the conditions of this Approval, 40 CFR Part 761, PCB Spill Cleanup Policy, or other applicable rules and regulations; (2) EPA determines that these activities pose an unreasonable risk of injury to health or the environment; or, (3) EPA finds that there is migration of PCBs from the Site.

RECORDKEEPING AND REPORTING CONDITIONS

22. The City shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the City in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
23. The City shall submit a final completion report in both hard and electronic (CD-ROM) formats, to the EPA within 60 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photo-documentation; characterization and verification sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer.
24. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
25. Nothing in this Approval is intended or is to be construed to prejudice any right or remedy concerning PCBs or other federally-regulated contaminants at the Site otherwise available under Section 6 of TSCA, 15 U.S.C. § 2605, 40 CFR Part 761, or other provisions of federal law.
26. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1

TABLE III
SITE CHARACTERIZATION AND WASTE DISPOSITION
SUMMARY TABLE
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT

SOURCE MATERIAL	SOURCE DISPOSITION	QUANTITY	SOURCE LOCATIONS	SUBSTRATE MATERIAL	SUBSTRATE/SOIL LOCATION	SUBSTRATE/SOIL DISPOSITION	QUANTITY	
							VOLUME	MASS
LOCKER ROOMS								
Exterior Paint	1	2,450 SF	Exterior Walls and Foundation	CMU/Grout	Exterior Walls	1	76 CY	106 T
				Concrete	Exposed Foundation	1	11.6 CY	23 T
					Window Sill	1		
					Window/Door Headers	5		
Expansion Joint Caulk	1	20 LF	Perimeter Windows and Doors	Steel	Window/Door Lintels	5	(5 ea)	
Exterior Window Frame Caulk	5	115 LF		Caulk	Exterior Expansion Joints	1	(2 ea)	
Interior Window Frame Caulk	8	115 LF		Metal	Window Frames	5	(7 ea)	
Exterior Door Caulk	5	140 LF		Caulk	Window Openings	8		
Interior Door Caulk	8	140 LF		Metal	Door Frames	5		
Window Glazing	4	232 LF		Exterior Window Sashes	Caulk	Door Openings	8	(8 ea)
Interior Paint	4	2,450 SF	Glass		Panes	8	(14 ea)	
Built Up Roofing	4	1,300 SF	Upper and Lower Roofs	Metal	Sashes	8	(14 ea)	
Roof Flashing Cement	9	168 LF	Roof Perimeters	CMU-Grout	Interior Walls	1	N/A	
				Plywood	Roof Deck	4	90 CY	
				Metal	Perimeter Flashing	8	(85 LF)	
KEY								
1: PCB Bulk Product Waste			5: Mixed Regulated Asbestos-PCB Bulk Product Waste					
2: PCB Remediation Waste greater than or equal to 50 ppm			6: Mixed Regulated Asbestos-PCB Remediation Waste greater than or equal to 50 ppm					
3: PCB Remediation Waste less than 50 ppm			7: Mixed Rregulated Asbestos-PCB Remediation Waste less then 50 ppm					
4: Connecticut Regulated PCB Waste			8: Mixed Regulated Asbestos-Connecticut Regulated PCB Waste					
			9: Regulated Asbestos					
The quantities reported above are estimates not intended for use as the basis for bids or other calculation.								

APPENDIX A.

TABLE III
SITE CHARACTERIZATION AND WASTE DISPOSITION
SUMMARY TABLE
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT

SOURCE MATERIAL	SOURCE DISPOSITION	QUANTITY	SOURCE LOCATIONS	SUBSTRATE MATERIAL	SUBSTRATE/SOIL LOCATION	SUBSTRATE/SOIL DISPOSITION	QUANTITY	
							VOLUME	MASS
				Soil	Area 1	3	1.8	39 T
					Area 2	3	3.0	
					Area 5	3	1.9	
					Area 6	3	1.9	
					Area 7	3	13	
					Area 8	3	1.9	
PRESS BOX								
Window Frame Caulk	8	50 LF	Exterior. All Window Frames	Metal	Window Frames	8		
Window Glazing Compound	8	525 LF	Exterior: A: Window Sashes	Metal	Sashes	8		
				Glass	Panes	8		
Door Frame Caulk	8	17 LF	Exterior: Door Frame	Metal	Door Frame	8		
Seam Caulk	1	70 LF	Exterior. Perimeter of Walls Base	Concrete	Exterior Walls	1	4.3 CY	8.6 T
HOME BLEACHERS								
Seam Caulk	1	22,640 LF	Seams of Seating Deck	Concrete	Seating Deck Planks	1	392 CY	770 T
				Composite	Pads Under Deck Planks	1	13 CY	5.3 T
				Concrete	Substructure Beams	1	130 CY	260 T
					Stringer Steps	1	18 CY	36 T
					Columns	1	35 CY	70 T
				Asphalt	Sidewalk in Front	2	43 CY	21 T
Soil	Underneath and Around Bleachers	2	1,221 CY	1,832 T				
KEY								
1: PCB Bulk Product Waste			5: Mixed Regulated Asbestos-PCB Bulk Product Waste					
2: PCB Remediation Waste greater than or equal to 50 ppm			6: Mixed Regulated Asbestos-PCB Remediation Waste greater than or equal to 50 ppm					
3: PCB Remediation Waste less than 50 ppm			7: Mixed Rregulated Asbestos-PCB Remediation Waste less then 50 ppm					
4: Connecticut Regulated PCB Waste			8: Mixed Regulated Asbestos-Connecticut Regulated PCB Waste					
The quantities reported above are estimates not intended for use as the basis for bids or other calculation.								

**TABLE III
SITE CHARACTERIZATION AND WASTE DISPOSITION
SUMMARY TABLE
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT**

SOURCE MATERIAL	SOURCE DISPOSITION	QUANTITY	SOURCE LOCATIONS	SUBSTRATE MATERIAL	SUBSTRATE/SOIL LOCATION	SUBSTRATE/SOIL DISPOSITION	QUANTITY	
							VOLUME	MASS
VISITOR'S BLEACHERS								
Seam Caulk	1	20,090 LF	Seams of Seating Deck	Concrete	Seating Deck Planks	1	327CY	640 T
				Composite	Pads Under Deck Planks	1	11 CY	4.3 T
				Concrete	Substructure Beams	1	115 CY	230 T
					Stringer Steps	1	16 CY	32 T
					Columns	1	40 CY	80 T
				Asphalt	Sidewalk in Front	2	30 CY	19 T
				Soil	Underneath and Around Bleachers	2	1650 CY	2,475 T
3	42 CY	63 T						
TRACK AND FIELD								
Bleacher Seam Caulk	1	(see above)	Seams of Seating Deck	Rubber	Track Surface	3	89 CY	75 T
					Pole Vault Run	3	4 CY	4 T
					Shot Put Circle	3	12 CY	10 T
				Concrete	Track Curbs	2	45 CY	90 T
				Soil	On Field in Front of Home Bleachers	3	104 CY	156 T
DRAINAGE SYSTEM								
Bleacher Seam Caulk	1	(see above)	Seams of Seating Deck	Concrete	Drain Pipe on Field	2	18 CY	36 T
					Catch Basin	2		
					Drain Pipe Between Basins	2		
					Drain Pipe to Pond	2		
				Sediment	Bottom of Catch Basin at North End of Field	3	1 CY	2 T
				Sediment	Bottom of Catch Basins at North End of Bleachers	2	2 CY	4.0 T
KEY								
1: PCB Bulk Product Waste			5: Mixed Regulated Asbestos-PCB Bulk Product Waste					
2: PCB Remediation Waste greater than or equal to 50 ppm			6: Mixed Regulated Asbestos-PCB Remediation Waste greater than or equal to 50 ppm					
3: PCB Remediation Waste less than 50 ppm			7: Mixed Rregulated Asbestos-PCB Remediation Waste less then 50 ppm					
4: Connecticut Regulated PCB Waste			8: Mixed Regulated Asbestos-Connecticut Regulated PCB Waste					
The quantities reported above are estimates not intended for use as the basis for bids or other calculation.								

**TABLE IV
POST REMEDIATION VERIFICATION
SAMPLES TABLE
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT**

SAMPLE AREA LOCATION	SUBSTRATE/ SOIL	DIMENSIONS OF REMEDIATION AREA	DEPTH OF REMEDIATION	VERIFICATION SAMPLE TYPE	NUMBER OF SAMPLES	SAMPLE FREQUENCY	QC DUPS	METHOD
LOCKER ROOMS								
North Side	Soil	4.5' X 32' (144 square feet)	6" below pre-existing grade	4 point composites on 4.5' X 4.25' grid	5	1 per 29 square feet		§761 Subpart O
East Side (north)	Soil	10' X 14.5' (145 square feet)	6" below pre-existing grade	9 point composite on 5.0' X 5.0' grid	1	1 per 145 square feet		§761 Subpart O
East Side (south)	Soil	10' X 25' (250 square feet)	12" below pre-existing grade	9 point composite on 5.0' X 5.0' grid	2	1 per 125 square feet	1	§761 Subpart O
South Side	Soil/ Cobblestone	5' X 40' (200 square feet)	6" below pre-existing grade	4 point composite on 5.0' X 5.0' grid	4	1 per 50 square feet		§761 Subpart O
West Side	Soil	5' X 5' (25 square feet)	6" below pre-existing grade	4 point composite on 5.0' X 5.0' grid	1	1 per 25 square feet		§761 Subpart O
Foundation under exterior walls	Concrete	150 linear feet	to grade	3 point on 5' linear grid	10	1 per 15 linear feet		§761 Subpart O and EPA Protocol
KEY								
The quantities reported above are estimates not intended for use as the basis for bids or other calculation.								
EPA Protocol refers to USEPA Region 1 Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011.								

APPENDIX B.

TABLE IV
POST REMEDIATION VERIFICATION
SAMPLES TABLE
BOWEN FIELD COMPLEX
175 CRESCENT STREET
NEW HAVEN, CONNECTICUT

SAMPLE AREA LOCATION	SUBSTRATE/ SOIL	DIMENSIONS OF REMEDIATION AREA	DEPTH OF REMEDIATION	VERIFICATION SAMPLE TYPE	NUMBER OF SAMPLES	SAMPLE FREQUENCY	QC DUPS	METHOD
HOME BLEACHERS								
Underneath and Around Bleachers	Soil	34,430 square feet	12"	9 point composite on 5.0' X 5.0' grid	135	1 per 225 square feet	8	\$761 Subpart O
			24"					
			40"					
Inside Edge of Track			6"					
VISITOR'S BLEACHERS								
Underneath Bleachers and Around Bleachers	Soil	29,050 square feet	16"	9 point composite on 5.0' X 5.0' grid	114	1 per 225 square feet	6	\$761 Subpart O
			40"					
			48"					
South of Bleacher			9'					
TRACK AND FIELD								
Track Surface	Asphalt Under Rubber Track Surface	34,000 sqaure feet	1 inch	9 point composite on 5.0' X 5.0' grid	151	1 per 225 square feet	8	\$761 Subpart O and EPA Protocol
Pole Vault Run								
Shot Put Circle								
KEY								
The quantities reported above are estimates not intended for use as the basis for bids or other calculation.								
EPA Protocol refers to USEPA Region 1 Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011.								